

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

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SAMUEL TROICE, HORACIO MENDEZ, :
ANNALISA MENDEZ, and :
PUNGA PUNGA FINANCIAL, LTD., :
individually and on behalf of all others :
similarly situated, :
Plaintiffs, : Civil Action No. 3:09-cv-01600-N
: Hon. David C. Godbey
- against - :
PROSKAUER ROSE, LLP, :
THOMAS V. SJOBLOM, :
P. MAURICIO ALVARADO, and :
CHADBOURNE & PARKE, LLP, :
Defendants. :
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**DECLARATION OF JAMES P. ROUHANDEH IN SUPPORT OF DEFENDANTS
PROSKAUER ROSE LLP, CHADBOURNE & PARKE LLP AND THOMAS V.
SJOBLOM'S OPPOSITION TO PLAINTIFFS' MOTION TO DEFER
RESOLUTION OF MOTIONS TO DISMISS, TO COMPEL RULE 26(f)
CONFERENCE AND FOR ENTRY OF SCHEDULING ORDER**

James P. Rouhandeh, pursuant to 28 U.S.C. § 1746, hereby declares:

1. I am an attorney admitted to practice pro hac vice before this Court, and I am a partner in the law firm of Davis Polk & Wardwell LLP, counsel for Proskauer Rose LLP ("Proskauer") in the above-captioned matter. I submit this declaration in support of Defendants Proskauer Rose LLP, Chadbourne & Parke LLP, and Thomas V. Sjoblom's Opposition to Plaintiffs' Motion to Defer Resolution of Motions to Dismiss, to Compel Rule 26(f) Conference and for Entry of Scheduling Order.

2. Attached hereto as Exhibit 1 is a true and correct copy of a March 20, 2009 letter from John R. Braatz to Ben L. Krage.

Dated: New York, New York
April 18, 2014

Respectfully submitted,
DAVIS POLK & WARDWELL LLP

By: /s/ James P. Rouhandeh
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